



Chattanooga-Hamilton County Air Pollution Control Bureau

July 25, 2022

Ms. Caroline Y. Freeman
Director
Air and Radiation Division
US Environmental Protection Agency Region 4
61 Forsyth Street S.W.
Atlanta, Georgia 30303-8960

Dear Ms. Freeman:

In Hamilton County the City of Chattanooga adopted Juneteenth as an official holiday starting June of 2022. There were numerous celebratory events scheduled, especially in the few days leading up to and the day of June 20. There was an evening fireworks event downtown June 17 at a baseball game for a special Alzheimer's Association fundraiser and a fireworks event less than two miles away from the Eastside Utility ozone site at the Volkswagen Plant on June 18. On June 18, there was also a fireworks event south of the Eastside site that, thus far, has not been specifically identified (both 18th events were viewed from a deck on the river by an employee of Air Pollution Control). Both ozone sites' data remained at unusually high levels at night after the fireworks June 18th. Eastside's ozone exceeded the standard on June 20th. There is a clear causal relationship between the celebratory events and the monitored exceedance.

We are notifying you that we will be applying for exceptional event status for the exceedance June 20 for 470654003 (Eastside Utility) if the ozone sites' 8-hour data stays low through October. Removing the exceedance and dropping the 4th highest data (69) to a lower number may have regulatory significance in calculating the design value at the end of three years- especially when the low numbers of 2020 rotate off. Currently the 5th highest data is 66 ppb for the Eastside Site for 2022. The 4th highest is 66 for the Soddy Daisy site (470651011).

If more data nearer the standard occurs between now and October, then submitting an exceptional event package will not benefit our agency because removal of one of the top 4 data points will not result in lowering the 4th highest number. If there is no regulatory benefit to applying, we will not submit a request package.

This data is flagged in AQS currently with the "I" for informational flags. If an exceptional event is requested, then the critical flags will be changed to the "R" series. Both sites were flagged for the same time period. Only one site exceeded. The data has been flagged with "IH" to indicate fireworks events.

We thought it important to give you a notification since the data is flagged in AQS. There is no explanation opportunity for "I" flags in AQS, and the possibility exists of formally requesting an exceptional event for the Juneteenth celebrations.

I trust this letter meets the notification requirements.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron Drumeller", with a stylized, flowing script.

Ron Drumeller
Executive Director

C: Todd Rinck, Katy Lusky, Sara Waterson: EPA Region 4
Bradley King, Michelle Oakes: State of Tennessee
DeAnna Oser: State of Georgia